



UNITED STATES DEPARTMENT OF EDUCATION

OFFICE OF ELEMENTARY AND SECONDARY EDUCATION

THE ASSISTANT SECRETARY

MAR 10 2006

Ms. Hannah Skandera
Deputy Commissioner
Florida Department of Education
325 West Gaines Street, Suite 814
Tallahassee, FL 32399-0400

Dear Ms. Skandera:

Thank you for submitting a proposal for consideration to participate in the Secretary's growth model pilot, which will allow selected States to use a growth-based accountability model to meet the goals of the No Child Left Behind Act (NCLB). Each proposal is being reviewed internally to determine how well it meets the seven core principles laid out in the Secretary's November 21, 2005 letter, making it eligible to advance to peer review.

The initial review of Florida's proposal indicates additional information is needed to determine how it meets the seven core principles. I remind you that an expected result from the pilot project is the ability to analyze how growth serves as a measure of accountability in comparison to the current status model. In accordance with Principle 4, such a comparison is only possible when a growth model and its growth targets are applied to all students and not only to students who missed the proficiency target. As we discussed in our March 9, 2006 phone call, please provide information to answer the following questions found in the Department's peer review guidance (please see www.ed.gov/policy/elsec/guid/growthmodelguidance.doc for that information). The reference in parenthesis is to that particular element in the guidance document:

Principle 1. Universal proficiency

- How does the State accountability model hold schools accountable for universal proficiency by 2013-14? (Principle 1.1)
- Does the State proposed growth model include a relationship between consequences and rate of student growth consistent with Section 1116 of ESEA? (Principle 1.4)

Principle 2. Establishing Appropriate Growth Targets at the Student level

- Has the State proposed a technically and educationally sound method of depicting annual student growth in relation to growth targets? (Principle 2.1)
 - Has the State adequately described a sound method of determining student growth over time? (Principle 2.1.1)
 - If a student has five years of data, is the determination of average growth a "best case" scenario comparing slopes obtained for 2-3-4-

and 5-years or will the average automatically always be based on the maximum number of years of data available?

- If student is highly mobile, how will this impact the determination of average student growth at the local school?
- How does the State project the impact of different starting points for students in the same school on the “validity” of growth determination with this school their AYP status determination?
- If Florida plans to incorporate confidence intervals for the growth model, please provide information on how these will be computed and applied to the “average student growth” projections.

Principle 4. Inclusion

- Does the State’s growth model proposal address the inclusion of all students, subgroups and schools appropriately? (Principle 4.1)
 - Does the State’s growth model address the inclusion of all students appropriately? (Principle 4.1.1)
 - Please verify whether all students in all schools in the State will be included in the growth model, for reporting and for accountability determination purposes.

Principle 6. Tracking Student Progress

- Has the State designed and implemented a technically and educationally sound system for accurately matching student data from one year to the next? (Principle 6.1)
 - What quality assurance procedures are used to maintain accuracy of the student matching system? (Principle 6.1.3)
 - What studies have been conducted to demonstrate the percentage of students who can be “matched” between two academic years? Three or more years? (Principle 6.1.4)
 - Please provide additional evidence of the match rates by subgroup for two, three, or more years.
- Does the State data infrastructure have the capacity to implement the proposed growth model? (Principle 6.2)
 - How does the proposed growth model take into account or otherwise adjust for decreasing student match rates over three or more years? How will this affect the school accountability criteria? (Principle 6.2.3)

As we discussed in our March 9, 2006 phone call, we would look more favorably upon a growth model proposal that does not include any additional cohort safe harbors. Therefore, we would prefer you submit the AYP Improvement Model as a separate amendment, due to the Department no later than April 1, 2006.

The additional information you provide will be considered an addendum to Florida’s original application and will be included in the review process for the pilot. **The information should be submitted no later than March 17, 2006.** Please provide the information to Dr. Catherine Freeman at catherine.freeman@ed.gov.

I appreciate your interest in the growth model pilot. If you have any questions regarding this request, please contact Dr. Freeman at the email address above or by calling (202) 401-0113. I thank you in advance for your response.

Sincerely,

A handwritten signature in cursive script that reads "Henry L. Johnson". The signature is written in black ink and is positioned above the printed name.

Henry L. Johnson

cc: Commissioner John Winn